

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Vandroth Backus, Willie Harrison Brown,)	Case No. 3:11-cv-3120 – PMD-HFF-MBS
Charlesann Buttone, Booker Manigault,)	
Edward McKnight, Moses Mims, Jr.,)	
Roosevelt Wallace and William G. Wilder,)	
on behalf of themselves and all other)	
similarly situated persons,)	<u>DEFENDANTS ROBERT W. HARRELL,</u>
)	<u>JR., JAMES H. HARRISON, AND ALAN</u>
)	<u>D. CLEMMON’S</u>
Plaintiffs,)	<u>FEDERAL RULE 26(a)(2)(B)</u>
)	<u>CERTIFICATION AND DESIGNATION</u>
vs.)	
)	
The State of South Carolina, <i>et al.</i> ,)	
Defendants.)	
)	
)	
)	
)	

Defendants, Robert W. Harrell, Jr., James H. Harrison, and Alan D. Clemmons by and through their undersigned counsel, herewith comply with Federal Rule 26(a)(2)(B) by designating the following individual who will appear as expert witnesses on Defendants’ behalf during the trial of this case:

**Thomas L. Brunell
Professor of Political Science
Senior Associate Dean
The University of Texas at Dallas
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1. Provide the most current curriculum vitae of each expert or a detailed summary of his qualifications to testify on each identified subject.

RESPONSE: The expert’s curriculum vitae has been filed previously with Defendants designation of Expert Witness (ECF #70).

2. Provide a report including:
 - a. A complete statement of all opinions to be expressed and the basis and reasons therefor; the data or other information considered by the witness in forming the opinions;
 - b. A list of all publications authored by the witness within the precedent ten years;
 - c. The compensation to be paid for the study and testimony; and
 - d. A listing of any other cases in which the witness has testified as an expert at trial or by deposition within the precedent four (4) years.

RESPONSE: The expert's report, which has been served on counsel for all parties, contains the requirements listed above; however, pursuant to Scheduling Order (ECF # 66) is not being filed herewith.

[signature page below]

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Columbia, South Carolina
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